

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

<b>UNITED STATES OF AMERICA</b>	§	
	§	
<b>v.</b>	§	<b>NO. 19-cr-246 (MCA)</b>
	§	
<b>CREAGHAN HARRY,</b>	§	
	§	
<b>Defendant.</b>	§	
	§	

**MOTION TO SEAL AND FOR LEAVE TO FILE REPLY *EX PARTE*  
OF THE PROSECUTION TEAM IN THIS PROCEEDING**

The United States respectfully submits this motion seeking an Order to Seal and for leave to file *ex parte* of the Prosecution Team in this proceeding the Filter Team’s Reply in Support of Its Motion for an Order Determining that Certain Documents Produced to Defendant in Case Number 20-cr-773 Under Federal Rule of Evidence 502(d) Are Not Privileged (“Filter Team’s Reply”), along with Reply Exhibit 1. The Filter Team’s Reply discusses documents produced to Defendant Adarsh Gupta under Rule 502(d) that, pursuant to this Court’s order in Case Number 20-cr-773, Dkt. No. 113, may not be shared with members of the prosecution team in *United States v. Harry* who are also members of the prosecution team in *United States v. Gupta*.

Accordingly, to avoid public disclosure or disclosure to the members of the prosecution team in this matter who are also members of the prosecution team in *United States v. Gupta*, the government requests that the Filter Team's Reply and Reply Exhibit 1 be sealed and filed *ex parte* of the prosecution team in this docket.

The proposed Reply is eight pages, not including the signature block and certificate of service.

PLEASE TAKE NOTICE that a proposed form of Order is submitted with this motion.

Respectfully submitted,

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U.S. Department of Justice

By: /s/ Steven S. Michaels  
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Dated: April 5, 2024

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing  
was electronically filed via CM/ECF on April 5, 2024.

/s/ Steven S. Michaels  
Steven S. Michaels  
Trial Attorney